

February 7, 2001

Magalie Roman Salas, Esq.
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *CC Docket No. 94-102*
December 6, 2000 and December 8, 2000 Letters Regarding
E-911 Phase II Implementation Reports

Dear Ms. Salas:

Dobson Cellular Systems, Inc. ("Dobson"), by counsel, hereby responds to the attached letters dated December 6, 2000 and December 8, 2000 sent to Dobson's corporate offices. The three letters dated December 6, 2000 state that Georgia RSA #14 Partnership, Georgia RSA #12 Partnership, and Gold Creek Cellular had failed to submit the required reports detailing their plan to implement an enhanced 911 Phase II automatic location information system. The December 8, 2000 letter states that Texas RSA #8 West Limited Partnership failed to submit the required report detailing their plan to implement an enhanced 911 Phase II automatic location information system. This will confirm that these entities are not affiliated Dobson.

Magalie Roman Salas, Esq.
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If you have any questions please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "Robert G. Morse". The signature is fluid and cursive, with the first name "Robert" being more legible than the last name "Morse".

Robert G. Morse
Timothy A. Kruyer¹

¹Practice limited to matters and proceedings before federal courts and agencies.

Federal Communications Commission
Washington, D.C. 20554

December 6, 2000

806217
Georgia RSA #14 Partnership
13439 N. Broadway Ext. Suite 200
Oklahoma City, OK 73114-2202

Re: November 9, 2000 E911 Phase II Carrier Implementation Report

By the Wireless Telecommunications Bureau:

1. Pursuant to section 20.3(h) of the Federal Communications Commission's (Commission) rules, wireless carriers were required to submit reports on or before November 9, 2000 to the Commission on their plans for implementation of wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) systems.¹ As of the date of this notice, Georgia RSA #14 Partnership has failed to submit the required report.
2. In accordance with Section 308(b) of the Communications Act of 1934 as amended, 47 U.S.C. § 308(b), Georgia RSA #14 Partnership, shall within fifteen (15) days of the date of this letter submit a report on its wireless E911 Phase II ALI implementation.
3. The report shall contain information on Georgia RSA #14 Partnership's implementation plans, as outlined in the *Public Notice*, released September 14, 2000, Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification.² A copy of the *Public Notice* is attached hereto.
4. Failure to file a report concerning Georgia RSA #14 Partnership's implementation plan for wireless E911 Phase II ALI systems constitutes a violation of the Commission's Rules. Failure to comply with this notice constitutes a continuing violation of the Commission's Rules and will be referred to the Commission's Enforcement Bureau and could result in administrative penalties, including monetary forfeiture. See *Forfeiture Policy Statement*, 12 FCC Rcd 17087 (1997).
5. Your report can be filed either electronically or as a paper filing. Electronic filings should be made using the Electronic Comment Filing System (ECFS). Reports filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. In completing the transmittal

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Third Report and Order*, 14 FCC Rcd 17388 (1999) (*E911 Third Report and Order*).


² See *Public Notice* Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification, DA 00-2099, CC Docket No. 94-102.

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screen, parties should include their full name, Postal Service mailing address, and the docket number of this proceeding. Parties filing electronically should also e-mail a copy of their report to WAustrie@fcc.gov. Parties who choose to file by paper must file an original and four copies of each filing with the Commission's Secretary, Magalie Roman Salas, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Washington, D.C. 20554 and a diskette copy to the Commission's copy contractor, International Transcription Service, Inc. (ITS), CY-B400, (202) 857-3800. In addition, parties must submit one copy to Wendy Austrie, Policy Division, Wireless Telecommunications Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, D.C. 20554. Reports will be available for public inspection during regular business hours in the FCC Public Reference Room, Room CY-A257, 445 12th Street, S.W., Washington, D.C. 20554.

6. Should you have any questions regarding this matter, please contact Ms. Wendy Austrie at 202-418-1310.

Federal Communications Commission

for 
Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau

Federal Communications Commission
Washington, D.C. 20554

December 6, 2000

806214
Georgia RSA #12 Partnership
13439 N. Broadway Ext. Suite 200
Oklahoma City, OK 73114-2202

Re: November 9, 2000 E911 Phase II Carrier Implementation Report

By the Wireless Telecommunications Bureau:

1. Pursuant to section 20.3(h) of the Federal Communications Commission's (Commission) rules, wireless carriers were required to submit reports on or before November 9, 2000 to the Commission on their plans for implementation of wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) systems.¹ As of the date of this notice, Georgia RSA #12 Partnership has failed to submit the required report.
2. In accordance with Section 308(b) of the Communications Act of 1934 as amended, 47 U.S.C. § 308(b), Georgia RSA #12 Partnership, shall within fifteen (15) days of the date of this letter submit a report on its wireless E911 Phase II ALI implementation.
3. The report shall contain information on Georgia RSA #12 Partnership's implementation plans, as outlined in the *Public Notice*, released September 14, 2000, Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification.² A copy of the *Public Notice* is attached hereto.
4. Failure to file a report concerning Georgia RSA #12 Partnership's implementation plan for wireless E911 Phase II ALI systems constitutes a violation of the Commission's Rules. Failure to comply with this notice constitutes a continuing violation of the Commission's Rules and will be referred to the Commission's Enforcement Bureau and could result in administrative penalties, including monetary forfeiture. See *Forfeiture Policy Statement*, 12 FCC Rcd 17087 (1997).
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Federal Communications Commission

for 
Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau

Federal Communications Commission
Washington, D.C. 20554

December 6, 2000

805232
Gold Creek Cellular
341 Route 55
LaGrangeville, NY 12540

Re: November 9, 2000 E911 Phase II Carrier Implementation Report

By the Wireless Telecommunications Bureau:

1. Pursuant to section 20.3(h) of the Federal Communications Commission's (Commission) rules, wireless carriers were required to submit reports on or before November 9, 2000 to the Commission on their plans for implementation of wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) systems.¹ As of the date of this notice, Gold Creek Cellular has failed to submit the required report.
2. In accordance with Section 308(b) of the Communications Act of 1934 as amended, 47 U.S.C. § 308(b), Gold Creek Cellular, shall within fifteen (15) days of the date of this letter submit a report on its wireless E911 Phase II ALI implementation.
3. The report shall contain information on Gold Creek Cellular's implementation plans, as outlined in the *Public Notice*, released September 14, 2000, Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification.² A copy of the *Public Notice* is attached hereto.
4. Failure to file a report concerning Gold Creek Cellular's implementation plan for wireless E911 Phase II ALI systems constitutes a violation of the Commission's Rules. Failure to comply with this notice constitutes a continuing violation of the Commission's Rules and will be referred to the Commission's Enforcement Bureau and could result in administrative penalties, including monetary forfeiture. See *Forfeiture Policy Statement*, 12 FCC Rcd 17087 (1997).
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Federal Communications Commission

Walter Boswell
for Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau

Federal Communications Commission
Washington, D.C. 20554

December 8, 2000

803520

Texas RSA #8 West Limited Partnership
13439 N. Broadway Ext. Suite 200
Oklahoma City, OK 73114-2202

Re: November 9, 2000 E911 Phase II Carrier Implementation Report

By the Wireless Telecommunications Bureau:

1. Pursuant to section 20.3(h) of the Federal Communications Commission's (Commission) rules, wireless carriers were required to submit reports on or before November 9, 2000 to the Commission on their plans for implementation of wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) systems.¹ As of the date of this notice, Texas RSA #8 West Limited Partnership has failed to submit the required report.
2. In accordance with Section 308(b) of the Communications Act of 1934 as amended, 47 U.S.C. § 308(b), Texas RSA #8 West Limited Partnership, shall within fifteen (15) days of the date of this letter submit a report on its wireless E911 Phase II ALI implementation.
3. The report shall contain information on Texas RSA #8 West Limited Partnership's implementation plans, as outlined in the *Public Notice*, released September 14, 2000, Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification.² A copy of the *Public Notice* is attached hereto.
4. Failure to file a report concerning Texas RSA #8 West Limited Partnership's implementation plan for wireless E911 Phase II ALI systems constitutes a violation of the Commission's Rules. Failure to comply with this notice constitutes a continuing violation of the Commission's Rules and will be referred to the Commission's Enforcement Bureau and could result in administrative penalties, including monetary forfeiture. See *Forfeiture Policy Statement*, 12 FCC Rcd 17087 (1997).
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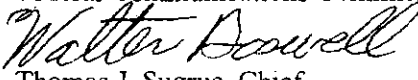
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